

Anthony J. Staltari (Attorney ID. No. 233022017)  
QUINN EMANUEL URQUHART & SULLIVAN, LLP  
51 Madison Avenue, 22<sup>nd</sup> Floor  
New York, NY 10010  
Tel.: (415) 875-6600  
anthonystaltari@quinnemanuel.com

Michael Shaheen, III (*pro hac vice*)  
Robert A. Zink (*pro hac vice*)  
QUINN EMANUEL URQUHART & SULLIVAN, LLP  
1300 I Street, NW, Suite 900  
Washington, D.C. 20005  
Tel.: (202) 538-8000  
michaelshaheen@quinnemanuel.com  
robertzink@quinnemanuel.com

Dakota Speas (*pro hac vice*)  
QUINN EMANUEL URQUHART & SULLIVAN, LLP  
865 S. Figueroa St., 10<sup>th</sup> Floor  
Los Angeles, CA 90017  
Tel.: (213) 443-3000  
dakotaspeas@quinnemanuel.com

*Attorneys for Defendants*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Commodity Futures Trading Commission,

*Plaintiff,*

v.

Traders Global Group Inc., a New Jersey  
corporation, d/b/a “My Forex Funds”;  
Traders Global Group Inc., a Canadian  
business organization; and Murtuza Kazmi,

*Defendants.*

Case No.: 3:23-cv-11808

**SUPPLEMENTAL DECLARATION  
OF MURTUZA KAZMI IN  
SUPPORT OF DEFENDANTS’  
REPLY IN SUPPORT OF MOTION  
TO MODIFY ORDER GRANTING  
PLAINTIFF’S MOTION FOR AN *EX  
PARTE* STATUTORY  
RESTRAINING ORDER,  
APPOINTMENT OF TEMPORARY  
RECEIVER, AND OTHER  
EQUITABLE RELIEF**

I, Murtuza Kazmi declare pursuant to 28 U.S.C. § 1746 that:

1. I am a Canadian citizen and reside in Ontario, Canada. I am a defendant in this lawsuit.

2. Because of the Statutory Restraining Order (“SRO”) entered in this case, financial institutions have locked my personal accounts and the accounts of Traders Global Group, Inc. (“TGG”).

3. The SRO has also frozen and locked out access to accounts operated by WooCommerce and Stripe, which My Forex Funds (“MFF”)<sup>1</sup> used to process credit card payments. WooCommerce provides an administrative platform which MFF can use to review and to dispute credit card chargeback requests.

4. I understand the assets frozen by the SRO include both my personal income and other income I have received from sources independent of MFF, including funds I received from personal property transactions that had nothing to do with MFF.

5. For example, my family sold personal real estate in Brampton, Ontario on December 15, 2020 and in East Gwillimbury, Ontario on July 5, 2021. We received approximately \$538,000 CAD from these sales. The proceeds from the sales were put towards subsequent real property purchases for the personal use of my family and me, including a personal home in Richmond Hill, Ontario. The \$538,000 CAD from these personal real property transactions did not come from MFF. Attached hereto as Exhibit 1 is a true and correct copy of the Funds Summary, Statement of Adjustment, December 10, 2020 letter regarding a discharge of the

---

<sup>1</sup> Defendants Traders Global Group Incorporated (a New Jersey Corporation) and Traders Global Group Incorporated (a Canadian business organization) do business as “My Forex Funds.”

mortgage, and December 10, 2020 Commission Statement for the sale of the Brampton property. Attached hereto as Exhibit 2 is a true and correct copy of the final Trust Ledger Statement for the property sale, signed documents completing and confirming the property sale, and a HelloSign Audit Trail reflecting the signing of documentation to complete the East Gwillimbury property sale. Attached hereto as Exhibit 3 is a true and correct copy of the final Trust Ledger Statement, property transfer records, and purchase and mortgage documents for the Richmond Hill property purchase. Attached hereto as Exhibit 4 is a true and correct copy of the sales documents for the sale of the Richmond Hill property.

6. In addition, in December 2017, my wife and I purchased a personal home in Mississauga, Ontario, years before MFF was started. Attached hereto as Exhibit 5 is a true and correct copy of the purchase documents for the Mississauga property.

7. The freeze over my personal assets unrelated to the business of MFF has left me without funds to pay living expenses for myself, my wife, two young children, and my parents-in-law. To provide for my family since the SRO was entered, I have had to rely on the generosity of friends. However, such reliance is not sustainable as my family's living expenses continue to mount.

8. I am aware of the Commodity Futures Trading Commission's assertion that \$31.55 million was transferred from one of TGG's corporate accounts in Canada to an account belonging to me. ECF 72 at 9; ECF 33-4 ¶ 29. This allegation is false. As evidenced in a bank statement from BMO, the \$31.55 million CAD "transfer" is, in actuality, comprised of a \$27 million Canadian corporation income tax payment (TXBAL 3028610 BUS/ENT) and a \$4.5 Canadian corporation tax payment (TXINS 3031010 BUS/ENT)—both paid on March 6, 2023. Attached hereto as Exhibit 6 is a true and correct copy of a BMO business banking statement for a Traders

Global Group, Inc. account for the period ending March 31, 2023 and transaction confirmations for the \$27 million CAD TXBAL tax payment and \$4.5 million CAD TXINS tax payment from that account.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct. Executed in RICHMOND HILL, ON, Canada on this 26th day of September 2023.

  
\_\_\_\_\_  
Murtuza Kazmi